

JCL LAW FIRM, APC

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Attorneys for Plaintiff LAGERALD WEBB

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

LAGERALD WEBB, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

SERVICE FIRST OF NORTHERN
CALIFORNIA, a California corporation, and
DOES 1-50, Inclusive,

Defendants.

Case No. STK-CV-UOE-2022-0007604

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: February 7, 2024

Time: 9:30 a.m.

Judge: Hon. Barbara A. Kronlund

Dept.: 10D

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on February 7, 2024, at 9:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 10D of the San Joaquin Superior Court, the Honorable Judge Barbara A.
4 Kronlund presiding, plaintiff LAGERALD WEBB will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit 1 to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
10 the Settlement Class;

11 4. Appoint Plaintiff LAGERALD WEBB as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, and Zakay Law Group, APLC, as Class Counsel; and

13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of the Plaintiff; (6) the Declaration of the Settlement Administrator; (7) the Class Action
18 and PAGA Settlement Agreement and exhibit attached thereto; (8) the [Proposed] Order Granting
19 Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (9) the
20 records, pleadings, and papers filed in this action; and (10) upon such other documentary and oral
21 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

22 As this Motion is unopposed, the Parties respectfully request relief from the page limit
23 requirement set by California Rules of Court, Rule 3.1113(d).

24 Dated: January 12, 2024

JCL LAW FIRM, APC

25 By: Sydney Castillo-Johnson
26 Sydney Castillo-Johnson, Esq.
27 Attorneys for Plaintiff
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